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8 Attorneys for Plaintiff  
9 UNITED STATES OF AMERICA

10  
11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 BRAYAN RAMOS-BRITO,  
17 aka, "Brian Ramos-Brito,"

18 Defendant.  
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No. 2:25-mj-03506-DUTY

MOTION TO DISMISS COMPLAINT  
WITHOUT PREJUDICE AGAINST  
DEFENDANT PURSUANT TO FEDERAL RULE  
OF CRIMINAL PROCEDURE 48(a)

21 The United States Attorney for the Central District of  
22 California hereby requests leave of the Court to dismiss the  
23 complaint against defendant Brayan Ramos-Brito without prejudice.

24 The government's request for dismissal is made in good faith  
25 and in the interest of justice. The law "generally require[s] a  
26 district court to defer to the government's decision to seek a  
27 dismissal of a criminal charge" under Rule 48(a) motions when they  
28 are not opposed by the defense. United States v. Gonzalez, 58 F.3d

1 459, 462 (9th Cir. 1995).

2 Accordingly, the government requests that the Court grant this  
3 motion to dismiss the complaint without prejudice against defendant  
4 Brayan Ramos-Brito pursuant to Federal Rule of Criminal Procedure  
5 48(a).

6 Dated: June 18, 2025

Respectfully submitted,

7 BILAL A. ESSAYLI  
United States Attorney

8 CHRISTINA T. SHAY  
9 Assistant United States Attorney  
Chief, Criminal Division

10  
11 /s/

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13 Attorneys for Plaintiff  
14 UNITED STATES OF AMERICA  
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